



May 15, 2025

Via email: [techforum@bpa.gov](mailto:techforum@bpa.gov)

Mr. John Hairston  
Bonneville Power Administration  
Administrator/Chief Executive Officer

Re: Comments Concerning April 21, 2025, BPA Transmission Planning Reform Workshop

Pacific Northwest Generating Cooperative (PNGC Power) provides these comments are intended to help inform and further shape BPA's Transmission Reform Process. PNGC Power believes it is imperative that BPA move expediently to develop solutions that will ensure reliable, cost-effective load service over the long term. BPA's transmission system faces many challenges ahead and we expect that changes will be disruptive. Difficult decisions will need to be made when exploring all options, but the focus must remain on its load service obligations to its preference customers.

PNGC Power is a growing organization that will likely become BPA's largest preference power customer at the start of the next power sales contract (i.e., Provider of Choice). PNGC Power members depend on BPA's Network Integration Transmission Service (NITS) to serve geographically isolated, economically disadvantaged communities, and many farmers, and irrigators. The purpose of our comments is twofold: (i) to reinforce our support for the broader comments submitted by the NT Customer Group on May 2, 2025, and (ii) to provide BPA with additional substantive feedback on issues that are important to our membership.

PNGC Power's Transmission Reform Principles:

- BPA must maintain focus on providing reliable, timely service to all preference customers, including those communities who rely on transfer service.
- BPA's obligation is to proactively plan, maintain and build a transmission system that will ensure reliable, long-term firm service for customer load service. We fully support overhauling BPA's planning and decision-making processes because they are critically important to the challenges we are facing today and in the future.

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- BPA should develop a “short-term” solution to expand offering 6NN products and services to support NITS load growth. This should include modifications to BPA’s transmission reservation business practices to increase scheduling window rights and duration of service.
- BPA must provide equal access to network transmission service for non-federal resource integration. This service is critical for communities who rely on non-federal resources to cost-effectively and reliably fulfill load service obligations that are beyond the firm capability that BPA can provide at the Tier 1 rate.
- As a transmission provider, BPA has an obligation to provide transmission service on a firm basis for ALL load growth reasonably forecasted by its network transmission customers. PNGC Power is extremely cautious about bifurcation concepts (i.e., “trended” and “non-trended”) that prioritize firm service based on BPA’s categorization of our retail member loads. We have experienced significant discriminatory policies and practices implemented through BPA’s New Large Single Load Policy. We are very concerned about the prospect of introducing similar concepts into transmission planning and operations, as they appear to undermine the intent of open access transmission principles intended to ensure equal and nondiscriminatory access to network transmission service.

PNGC Power appreciates Bonneville’s collaborative approach to meeting the transmission service needs of its customers on a long-term, sustainable basis. We recognize that there are no simple solutions and that difficult decisions will need to be made in a compressed timeframe. We look forward to continuing to work with the agency and its staff going forward to resolve the current set of challenges together.

Sincerely,

/s/Chris Allen  
VP Power Supply and Transmission Contracts  
PNGC Power